

WWR# 040364618

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:  
KOSTYANTYN BUGARENKO

CITIZENS BANK, N.A. Debtor  
Movant

Case No 19-11270-jkf

Chapter 13

Related to Doc. Nos.: 29, 35

**STIPULATION RESOLVING OBJECTION TO DEBTOR'S CHAPTER 13 PLAN**

Now this \_\_\_\_\_ day of \_\_\_\_\_, 2020. Upon Chapter 13 Plan filed by Debtor and the Objection to Confirmation of Debtor's Chapter 13 Plan filed by Citizens Bank, N.A. and upon statements of counsel, the evidence and law:

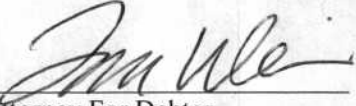
This Court FINDS the Citizens Bank, N.A., Movant herein, is a creditor of the estate by virtue of a certain Retail Installment Contract with the Debtor, secured by 2014 Dodge Ram 1500, VIN: 3C6TRVB66EE106601. That the Movant has not been adequately protected and that Debtor's Plan does not provide adequate protection of Movant's secured interest.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Citizens Bank, N.A., be and is hereby granted relief from the Automatic Stay to take the necessary steps to repossess and liquidate its collateral referenced herein. That Debtor wishes to surrender Movant's collateral, more specifically described as one 2014 Dodge Ram 1500, VIN: 3C6TRVB66EE106601. That the Automatic Stay of all proceedings, as provided under Section 362 of the Bankruptcy Reform Act of 1978 (The Code), 11 U.S.C. Section 362, is modified to allow the above-captioned Movant to exercise any and all of its remedies under its loan documentation and under state law to proceed with repossession and sale of one 2014 Dodge Ram 1500, VIN: 3C6TRVB66EE106601.

Honorable Jean K Fitzsimon  
United States Bankruptcy Judge

/s/ Nathalie Paul

Attorney for Movant  
Nathalie Paul, PA Bar No. 309118  
170 S. Independence Mall W., Suite 874W  
Philadelphia, PA 19106

  
Attorney For Debtor  
Tova Weiss  
648 2<sup>nd</sup> Street Pike  
Southampton, PA 18966-3941

/s/ Polly A. Langdon

For Trustee Scott F. Waterman  
2901 St Lawrence Street  
Ste 100  
Reading, PA 19606-2265